

**Category #22:**

Cleaning products testing should conform to American Society for Testing Materials standards (ASTM).

**State Response:**

ASTM establishes the testing methods that should be used to evaluate products and their ingredients. However, ASTM does not establish the standards that specific product categories must meet. The Green Seal criteria require testing using ASTM or equivalent test methods where they are available. OGS would support a review and revision of approved testing methods to see if they can be further improved while still allowing for reasonable variety and innovation in the market.

**Frequently Asked Public Comment:****Meet or Exceed ASTM Standards**

--Product formulations must meet or exceed established American Society for Testing and Materials (ASTM standards for the specific product category for efficacy) (Apply to all cleaning products). (Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)

--Proposed Change--Under Section V. Designation of Approved Products, Letter B. Selection of Approved Environmentally Sensitive Cleaning Products, 1. Green Seal, Inc. GS-37: It states that even companies that can provide proof of Green Seal Certification need to submit ASTM testing data. Since Green Seal Certification requires certified cleaners to meet the appropriate ASTM performance specification, we propose that this requirement be omitted for products proven to be certified. The Green Seal Letter and Certificate submitted for any given certified cleaner ensures that the said product has met the ASTM testing requirements.

(Tom Seitz, Environmental Program Director, North America, Johnson-Diversey)